

### **REMARKS/ARGUMENTS**

This Amendment is submitted in response to the Office Action dated December 5, 2005, and within the three month period for reply extending to March 6, 2006. The status of the claims is summarized as follows:

- Claim 1 is currently amended,
- Claims 10-20 are cancelled per the Restriction Requirement Response filed March 25, 2005,
- Claims 21-27 are new, and
- Claims 1-9 and 21-27 are pending.

#### **Rejections under 35 U.S.C. 102**

Claims 1-7 were rejected under 35 U.S.C. 102(b) as being anticipated by Sandaiji et al. ("Sandaiji" hereafter) (U.S. Patent No. 4,982,065). These rejections are traversed.

Sandaiji teaches an apparatus for performing a laser-induced etching process on a gapped bar material to form grooves or holes on a surface of the gapped bar. Specifically, Sandaiji teaches that the gapped bar is positioned in a phosphoric acid aqueous solution or an alkali metal hydroxide aqueous solution. Then, the gapped bar is irradiated by a laser beam having a predetermined power and a predetermined scanning speed. The laser beam induces an etching chemical reaction at the point of incidence with the gapped bar in the aqueous solution. As the laser beam is applied to the gapped bar, the gapped bar is moved relative to the laser beam such that a precise track is etched within the gapped bar.

The Office has asserted that Sandaiji teaches an apparatus for "depositing an etchant coating on a substrate." However, the Applicants do not find such a teaching in Sandaiji. Because the etching process as taught by Sandaiji is defined to remove material from a surface, the Applicants submit that the etching process and associated apparatus of

Sandaiji is not related to material deposition. Additionally, the Applicants do not find the Office's phrase "depositing an etchant coating" within the teachings of Sandaiji. The method and associated apparatus of Sandaiji is not concerned with deposition of materials. More specifically, Sandaiji does not teach "an apparatus for depositing a planarizing layer over a wafer," as recited in claim 1. Also, Sandaiji does not teach that the container (2) is configured to contain an "electroless plating solution." Additionally, the sample holder (3) of Sandaiji is not disclosed as being defined to support a wafer. Therefore, Sandaiji does not teach a "wafer support structure."

The Office is reminded that a claim is anticipated under 35 U.S.C. 102 only when each and every feature of the claim is taught by a single prior art reference. Because Sandaiji does not teach an apparatus for "depositing a planarizing layer over a wafer," a tank configured to contain an "electroless plating solution," and a "wafer support structure," as recited in claim 1, Sandaiji does not teach each and every feature of claim 1. Therefore, the Applicants respectfully submit that claim 1 is not anticipated by Sandaiji under 35 U.S.C. 102.

The foregoing notwithstanding, the Applicants have amended claim 1 to recite that the planar member is capable of being positioned proximate to the wafer to be supported by the wafer support structure, "such that the planar member serves as an upper confinement boundary for material deposited on the wafer through electroless plating reactions." As previously mentioned, Sandaiji is not concerned with deposition of materials, particular deposition of material on a wafer through electroless plating reactions. Rather, Sandaiji is concerned with removal of material from a gapped bar through an etching process. Therefore, it is not reasonable to infer that the quartz window (7) of Sandaiji teaches the planar member of claim 1, wherein the planar member serves as an upper confinement boundary for material deposited on the wafer through electroless plating reactions.

With respect to dependent claim 5, the Office has asserted that Sandaiji teaches a radiant energy source configured to apply a substantially uniform amount of radiant energy over a surface of the wafer upon which the radiant energy will be incident. However, the Office has not identified such a teaching within Sandaiji, and the Applicants do not find such a teaching within Sandaiji. Rather, the Applicants find extensive teaching within Sandaiji concerning control of the laser power and laser beam scanning speed to obtain a precisely etched trench on the gapped bar surface. For example, Sandaiji [6:15-18] teaches that "the etched depth and the dimensional accuracy depend upon the laser power and the scanning speed of the laser beam." The Applicants submit that Sandaiji's teaching of a "laser beam" defined to be precisely controlled and scanned over a particular track on a surface, does not teach a radiant energy source configured to apply a substantially uniform amount of radiant energy over a surface of a wafer, as recited in claim 5. Although claim 5 is patentable for at least the reasons provided for claim 1, the Applicants respectfully submit that Sandaiji also fails to teach the features recited in claim 5.

With respect to dependent claim 6, the Office has asserted that Sandaiji teaches a planar member that is broadly flexible and locally rigid. However, the Office has not identified such a teaching within Sandaiji, and the Applicants do not find such a teaching within Sandaiji. The quartz window (7), which the Office has asserted as teaching the planar member of claim 1, is not disclosed by Sandaiji as being "broadly flexible and locally rigid." Although claim 6 is patentable for at least the reasons provided for claim 1, the Applicants respectfully submit that Sandaiji also fails to teach the features of claim 6.

With respect to dependent claim 7, the Office has asserted that Sandaiji teaches a backing member disposed against a backside of the planar member, wherein the backing member is configured to control a planarity of the planar member. The Office has asserted that the quartz window (7) of Sandaiji teaches the planar member and the lens

system (10) of Sandaiji teaches the backing member. However, the lens system (10) of Sandaiji is not disclosed as being configured to control the planarity of the quartz window (7). Furthermore, because the lens system (10) of Sandaiji is not configured to physically influence the quartz window (7), it is not reasonable to conclude that the lens system (10) is capable of controlling the planarity of the quartz window (7). Therefore, the backing member features of dependent claim 7 are not taught by the lens system (10) of Sandaiji. Although claim 7 is patentable for at least the reasons provided for claim 1, the Applicants respectfully submit that Sandaiji also fails to teach the features of claim 7.

In view of the foregoing, the Applicants respectfully submit that Sandaiji fails to teach each and every feature of claim 1, as required for anticipation under 35 U.S.C. 102. Also, because each of dependent claims 2-7 incorporates the features of claim 1, the Applicants submit that each of dependent claims 2-7 is patentable over Sandaiji for at least the same reasons provided for claim 1. The Applicants further submit that dependent claims 5-7 are each patentable over Sandaiji for the additional reasons discussed above. Therefore, the Office is kindly requested to withdraw the rejections of claims 1-7.

#### **Rejections under 35 U.S.C. 103**

Claims 8-9 were rejected under 35 U.S.C. 103(a) as being unpatentable over Sandaiji in view of Ballantine et al. ("Ballantine" hereafter) (U.S. Patent No. 6,699,400). These rejections are traversed.

Each of dependent claims 8-9 incorporates the features of independent claim 1 from which it depends. Therefore, the Applicants respectfully submit that each of claims 8-9 is patentable for at least the same reasons as claim 1. The Office is kindly requested to withdraw the rejections of claims 8-9.

**New Claims**

New claims 21-27 are presented in this Amendment. Each of claims 21-27 is supported by the specification as originally filed. Therefore, no new matter is introduced. The Applicants submit that each of claims 21-27 is patentable over the cited art of record.

The Applicants respectfully submit that all of the pending claims are in condition for allowance. Therefore, a Notice of Allowance is requested. If the Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6914. Also, if any additional fees are due in connection with filing this Amendment, the Commissioner is authorized to charge Deposit Account No. 50-0805 (Order No. LAM2P461). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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